

# ReedSmith

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May 9, 2013

**Via ECF and Electronic Mail ([njdnef\\_mannion@njd.uscourts.gov](mailto:njdnef_mannion@njd.uscourts.gov))**

The Honorable Judge Steven C. Mannion

United States Magistrate Judge for the District of New Jersey

Martin Luther King Federal Building & U.S. Courthouse

50 Walnut Street, Room MLK 4A

Newark, NJ 07101

**Re: Patient Care Associates LLC a/s/o J.G. v. Merck & Co. et al**  
**Civil Action No. 2:13-cv-02569-ES-SCM**

Dear Judge Mannion:

This firm represents the Defendant Merck & Co., Inc. (improperly named as Merck & Co.), ("Merck") in the above-referenced litigation. I write to respectfully request a 30-day extension of time to answer, move, or otherwise respond to plaintiff's Complaint. This extension will provide Merck additional time to investigate the allegations in this matter, allow the claims fiduciary time to finalize their review of an appeal submitted by Plaintiff, and to allow the parties an opportunity to explore settlement.

We have contacted plaintiff's counsel, Andrew R. Bronsnick, Esq., and he consents to this request.

Defendant's deadline is May 13, 2013. If Your Honor grants this extension request, defendant will answer, move, or otherwise respond to the Complaint on or before June 12, 2013.

Thank you for your consideration of this request.

Respectfully Submitted,

*s/Aaron M. Bender, Esq.*

AARON M. BENDER

AMB/cat

cc: Andrew R. Bronsnick, Esq. (via ECF, and Electronic Mail [abronsnick@massoodlaw.com](mailto:abronsnick@massoodlaw.com))